

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO:

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) MDL No. 1456
) Civil Action No. 01-12257-PBS

) Judge Patti B. Saris

)
) The City of New York v. Abbott Labs., et al.
) (S.D.N.Y. No. 04-CV-06054)
)
) County of Suffolk v. Abbott Labs., et al.
) (E.D.N.Y. No. CV-03-229)
)
) County of Westchester v. Abbott Labs., et al.
) (S.D.N.Y. No. 03-CV-6178)
)
) County of Rockland v. Abbott Labs., et al.
) (S.D.N.Y. No. 03-CV-7055)
)
) County of Dutchess v. Abbott Labs, et al.
) (S.D.N.Y. No. 05-CV-06458)
)
) County of Putnam v. Abbott Labs, et al.
) (S.D.N.Y. No. 05-CV-04740)
)
) County of Washington v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00408)
)
) County of Rensselaer v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00422)
)
) County of Albany v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00425)
)
) County of Warren v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00468)
)
) County of Greene v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00474)
)
) County of Saratoga v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00478)
)
) County of Columbia v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00867)
)
) Essex County v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00878)
)
) County of Chenango v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00354)
)
) County of Broome v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00456)
)
) County of Onondaga v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00088)
)
) County of Tompkins v. Abbott Labs, et al.
) (N.D.N.Y. No. 05-CV-00397)
)

County of Cayuga v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00423))
County of Madison v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00714))
County of Cortland v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00881))
County of Herkimer v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00415))
County of Oneida v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00489))
County of Fulton v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00519))
County of St. Lawrence v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00479))
County of Jefferson v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00715))
County of Lewis v. Abbott Labs, et al.)
(N.D.N.Y. No. 05-CV-00839))
County of Chautauqua v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06204))
County of Allegany v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06231))
County of Cattaraugus v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06242))
County of Genesee v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06206))
County of Wayne v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06138))
County of Monroe v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06148))
County of Yates v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06172))
County of Niagara v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06296))
County of Seneca v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06370))
County of Orleans v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06371))
County of Ontario v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06373))
County of Schuyler v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06387))
County of Steuben v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06223))
County of Chemung v. Abbott Labs, et al.)
(W.D.N.Y. No. 05-CV-06744))

County of Ulster v. Abbott Labs, et al.)
(N.D.N.Y. Case No. 06-CV-0123))
County of Wyoming v. Abbott Labs, et al.)
(W.D.N.Y. Case No. 05-CV-6379))
)
AND)
)
County of Nassau v. Abbott Labs, et al.)
(E.D.N.Y. No. 04-CV-5126))
)

**DECLARATION OF LUCY FOWLER IN SUPPORT OF
DEFENDANT ASTRAZENECA'S INDIVIDUAL REPLY
MEMORANDUM OF LAW IN FURTHER SUPPORT OF DEFENDANTS'
JOINT MOTION TO DISMISS**

I, Lucy Fowler, declare as follows:

1. I am an attorney with Foley Hoag LLP, counsel for Defendant AstraZeneca Pharmaceuticals LP in this action. I submit this declaration in support of AstraZeneca Pharmaceuticals LP's Individual Memorandum of Law in Further Support of Defendants' Joint Motion to Dismiss.

2. Attached as Exhibit A is a true and correct copy of AstraZeneca's Corporate Integrity Agreement with the Office of Inspector General of the United States Department of Health and Human Services.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Boston, Massachusetts
May 11, 2006

Respectfully submitted,

By: /s/ Lucy Fowler

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Inc., and AstraZeneca LP*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on May 11, 2006, a copy to LexisNexis File & Serve for posting and notification to all parties.

/s/ Lucy Fowler

Lucy Fowler